

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

In re:

**Terrence L. Mason
and
Tracey L. Mason**

Case No. : 5:14-bk-769

In re: Medical Rehabilitative Services, Ltd.,

Case No. : 5:14-bk-879

Motion to Reopen Consolidated Bankruptcy Cases

Now comes Terrence L. Mason, and Tracey L. Mason, and Medical Rehabilitative Services, Ltd., by their attorneys, Martin P. Sheehan,, Esq., and SHEEHAN & NUGENT, P.L.L.C., and move the Court to reopen the above captioned cases:

In support thereof, the Debtors assert as follows:

1. On November 5, 2015 a consolidated Chapter 11 Plan of Reorganization was confirmed.
2. The case was closed pending the payment of monies in accordance with the confirmed Plan of Reorganization on April 19, 2016.
3. The Court retained jurisdiction.
4. The Debtors have discovered that certain aspects of the Plan of Reorganization were suggested based on incomplete and erroneous information. Part of the motion to reopen is to address those issues. Those issues may be timely addressed under Bankruptcy Rule 9024.
5. The Debtors have encountered some change in circumstances that have affected their income stream.

WHEREFORE, the Debtors in the above captioned matters, moved to reopen the cases to permit the adjudication of issues and the filing of an amended plan of reorganization.

RESPECTFULLY SUBMITTED

s/ Martin P. Sheehan

Martin P. Sheehan, Trustee
WV Bar No. 4812

SHEEHAN & NUGENT, PLLC

41 Fifteenth Street
Wheeling WV 26003
(304) 232-1064
(304) 232-1066 FAX

CERTIFICATE OF SERVICE

I, MARTIN P. SHEEHAN, do certify that service of the foregoing document was served
this 17th day of 2018, electronically upon

Debra A. Wertman, AUST
300 Virginia Street, East
Room 2025
Charleston, WV 25301
(Electronically)

s/ Martin P. Sheehan

Martin P. Sheehan, Trustee
41 Fifteenth Street
Wheeling WV 26003